



**ENGEL &
MARTIN, LLC**

Joshua Engel, Partner
Jim Hardin, Partner
Mary Martin, Partner
Anne Tamashasky, Of Counsel

September 6, 2022

Via Email Only

Amanda T. Quan
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Key Tower, 127 Public Square, Suite 4100
Cleveland, OH 44114

Re: *Noakes v. Case Western Reserve University, et al.*
N.D. Ohio Case Number 1:21-cv-01776

Dear Amanda:

This letter is intended to set forth our view on current settlement discussions and this litigation.

[REDACTED]

Accordingly, the Litigation and all outstanding complaints brought by our client must proceed to a speedy resolution.

We expect to receive responses to outstanding discovery by September 13, 2022. Please find attached a revised draft of a proposed protective order. I know we worked on this last year and exchanged drafts (I *think* this is the latest version); we expect that this can be submitted to the Court sufficiently in advance of September 13, 2022 so that any discovery will not be delayed for FERPA reasons.

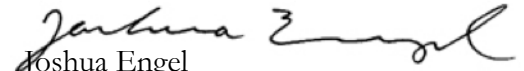
Please send any comments or suggestions on the proposed scheduling order dates I previously provided sufficiently in advance of the Status Conference so that we can provide dates to the Court.

As I previously indicated, we expect CWRU to continue and complete in a timely manner all outstanding investigations into complaints by our client. We also expect CWRU to continue any and all appropriate conduct and professionalism investigations and adjudications related to the petition, class survey and other related harassment, and [REDACTED] submission of fraudulent documents during the Tumblr investigation. Since CWRU is aware of these matters we do not believe any further action on our part is necessary but let me know if we need to take any further action to make sure CWRU is able to proceed with these important matters.

September 6, 2022
Page 2 of 2

If you have any questions or concerns, please do not hesitate to give me a call.

Sincerely,


Joshua Engel

cc: Anne Tamashasky, Esq.